

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION**

MDL No. 2804

This document relates to:  
*The County of Summit, Ohio, et al. v. Purdue  
Pharma L.P., et al.*  
Case No. 18-op-45090

Hon. Dan Aaron Polster

*The County of Cuyahoga, et al. v. Purdue  
Pharma L.P., et al.*  
Case No. 17-op-45004

*City of Cleveland, Ohio, et al. v.  
AmerisourceBergen Drug Corp., et al.*  
Case No. 18-op-45132

**MOTION FOR LEAVE TO FILE  
MEMORANDUM IN SUPPORT OF THE MANUFACTURER DEFENDANTS' JOINT  
MOTION TO DISMISS TRACK 1 PLAINTIFFS' CLAIMS FOR DAMAGES**

Defendants Cardinal Health, Inc. and McKesson Corporation (collectively, "Movants") request leave to file a Memorandum in Support of the Manufacturer Defendants' Joint Motion To Dismiss Track 1 Plaintiffs' Claims for Damages, attached as Exhibit 1. Pursuant to CMO-1 § 6(g), Dkt. 232, the Court has placed a moratorium on filing motions that are not expressly authorized absent further Order of this Court. Distributors thus request leave to file the attached Motion.

The attached Memorandum articulates Movants' support for the Manufacturer Defendants' Joint Motion to Dismiss Track 1 Plaintiffs' Claims for Damages Pursuant to Rule 41(b), which Manufacturer Defendants have requested leave to file. Dkt. 1073. Permitting Movants to join in Manufacturers' Joint Motion conserves this Court's resources by eliminating the need for duplicative motions concerning the issues raised in the Joint Motion.

Movants therefore respectfully request that this Court grant Distributors' leave to file the attached Motion.

Dated: November 6, 2018

Respectfully submitted,

/s/ Enu Mainigi

Enu Mainigi

F. Lane Heard III

Steven M. Pyser

Ashley W. Hardin

**WILLIAMS & CONNOLLY LLP**

725 Twelfth Street, NW

Washington, DC 20005

Tel: (202) 434-5000

Fax: (202) 434-5029

EMainigi@wc.com

lheard@wc.com

spyser@wc.com

ahardin@wc.com

*Counsel for Cardinal Health, Inc.*

/s/ Geoffrey Hobart

Geoffrey Hobart

Mark Lynch

Christian Pistilli

**COVINGTON & BURLING LLP**

One CityCenter

850 Tenth Street NW

Washington, DC 20001

Tel: (202) 662-5281

ghobart@cov.com

mlynch@cov.com

cpistilli@cov.com

*Counsel for McKesson Corporation*

**CERTIFICATE OF SERVICE**

I, Ashley W. Hardin, hereby certify that the foregoing document and supporting papers were served via the Court's ECF system to all counsel of record.

/s/ Ashley W. Hardin  
Ashley W. Hardin